

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

TONY and DOROTHY TURNER,

Plaintiffs,

v.

**AMERICAN INTERNATIONAL
GROUP, INC; et al.,**

Defendants.

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CIVILCASE NO. 3:05-CV-753

**SUPPLEMENT TO PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION
FOR AN EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION TO
REMAND FOR THE PURPOSE OF CONDUCTING REMAND-RELATED
DISCOVERY**

COMES NOW the Plaintiffs, by and through their attorneys of record, and provide the following Supplement to Opposition to Defendants' Motion for an Extension of Time to Respond to Plaintiffs' Motion to Remand for the Purpose of Conducting Remand-Related Discovery.

On July 7, 2005, Plaintiffs commenced this action by filing a complaint against Defendants in the Circuit Court of Macon County, Alabama, CV-05-136. On August 8, 2005, Defendants removed the present action to this Court on diversity jurisdiction under 28 U.S.C. § 1332(a). On September 1, 2005, Plaintiffs filed a Motion to Remand arguing against the existence of diversity jurisdiction. On September 9, 2005, Defendants filed a Motion for an Extension of Time to Respond to Plaintiffs' Motion to Remand for the Purpose of Conducting Remand-Related Discovery, while also filing a Memorandum of Law in support of their motion. On September 16, 2005, Plaintiffs filed an Opposition to

Defendants' Motion for an Extension of Time to Respond to Plaintiffs' Motion to Remand for the Purpose of Conducting Remand-Related Discovery.

In two identical matters, Edward Waller v. American General Finance, Inc., et al., Civil Action No. 2:05-cv-453-D (S.D.Ala. October 4, 2005)(attached as Exhibit "A"), and Steve and Nancy Robinson v. American General Finance, Inc., et al., Civil Action No. 2:05-cv-452-D (S.D.Ala. October 4, 2005)(attached as Exhibit "B"), the Honorable Judge Callie V. S. Granade of the United States District Court for the Southern District of Alabama recently denied these very same Defendants' Motion for an Extension of Time to Respond to Plaintiffs' Motion to Remand for the Purpose of Conducting Remand-Related Discovery. Plaintiffs respectfully ask this Court to consider the ruling of Judge Granade as persuasive authority and for this Court to enter a similar Order to prevent further delay in this case.

WHEREFORE, Plaintiffs respectfully urge this Honorable Court to deny Defendants' Motion for an Extension of Time to Respond to Plaintiffs' Motion to Remand for the Purpose of Conducting Remand-Related Discovery and remand this case to the Circuit Court of Macon County, Alabama.

/s/ Charles Lance Gould
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CERTIFICATE OF SERVICE

I hereby certify that I have filed the original of the foregoing document in this Court with copies to be served upon all Counsel of record as listed below by placing a copy of same in the United States Mail, first class, postage prepaid on this the 13th day of October, 2005.

/s/ Charles Lance Gould
OF COUNSEL

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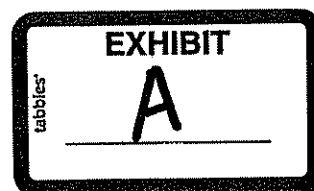
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Full docket text for document 25:

ENDORSED ORDER denying [21] Motion for Extension of Time to File Response to Plaintiff's Motion to Remand for the Purpose of Conducting Remand-Related Discovery. Signed by Judge Callie V. S. Granade on 10/4/2005. (Granade, Callie)

PACER Service Center			
Transaction Receipt			
10/13/2005 08:30:48			
PACER Login:	bw0126	Client Code:	American General Finance
Description:	History/Documents	Search Criteria:	2:05-cv-00453-CG-D
Billable Pages:	1	Cost:	0.08



Full docket text for document 26:

ENDORSED ORDER denying [21] Motion for Extension of Time to File Response to Plaintiffs' Motion to Remand for the Purpose of Conducting Remand-Related Discovery. Signed by Judge Callie V. S. Granade on 10/4/2005. (Granade, Callie)

PACER Service Center			
Transaction Receipt			
10/13/2005 08:24:54			
PACER Login:	bw0126	Client Code:	American General Finance
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